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10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 OAKLAND DIVISION

13 In re Meta Browsing Tracking Litigation

Case No. 4:22-cv-05267-JST

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15 ~~PROPOSED~~ ORDER GRANTING  
16 MOTION FOR APPOINTMENT OF  
17 INTERIM CLASS COUNSEL  
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1 Upon review of the Motion for Appointment of Interim Class Counsel filed by Plaintiffs  
2 Gabriele Willis, Kerreisha Davis, and Wayne Mitchell, the Court hereby **GRANTS** the Motion and  
3 **ORDERS** as follows:

4 1. Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, Girard Sharp LLP and  
5 Milberg Coleman Bryson Phillips Grossman, PLLC are appointed as Interim Co-Lead Counsel.

6 2. Consistent with the Manual for Complex Litigation, Fourth, §§ 10.221 and 40.22, Interim  
7 Co-Lead Counsel shall have the authority to perform or delegate the following tasks on behalf of all  
8 Plaintiffs in the Consolidated Action:

9 a. directing, coordinating, and supervising the prosecution of Plaintiffs' claims in  
10 this Consolidated Action;

11 b. preparing, structuring, and presenting pretrial and other case management orders;

12 c. convening meetings of counsel;

13 d. communicating with defense counsel;

14 e. initiating, responding to, scheduling, briefing, and arguing all motions;

15 f. appearing at all hearings and conferences regarding the case;

16 g. determining the scope, order, and conduct of all discovery proceedings;

17 h. assigning work to Plaintiffs' counsel in this action, as necessary and appropriate;

18 i. retaining experts;

19 j. conducting settlement negotiations on behalf of Plaintiffs and the class;

20 k. entering into stipulations with opposing counsel as necessary for the conduct of  
21 the litigation;

22 l. preparing and distributing status reports to any other law firms that might seek to  
23 represent the proposed class;

24 m. collecting and reviewing time and expense records from Plaintiffs' counsel on a  
25 regular basis, or as provided for under any Court-approved protocol;

26 n. coordinating activities to avoid duplication and inefficiency in the filing, serving,  
27 and/or implementation of pleadings, other court papers, discovery papers, and discovery practice, and  
28 generally in the litigation;

1 o. coordinating discovery and briefing of common legal issues, and if appropriate,  
2 settlement approval proceedings; and

3 p. performing such other duties that may be incidental to proper coordination of  
4 Plaintiffs' pretrial activities or authorized by further order of this Court.

5 3. The Court approves the Timekeeping Protocol attached as **Exhibit B** to the Declaration  
6 of Adam E. Polk. The terms of the Protocol must be followed by all counsel for Plaintiffs.

7 **IT IS SO ORDERED.**

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9 DATED: December 22, 2022

  
HONORABLE JON S. TIGAR  
United States District Judge